

Stephen W. Lewis, Bar #1952  
Laron Lind, Bar #8334  
Bryant T. Hinckley, Bar #15630  
Assistant Attorney General  
Sean D. Reyes, Bar # 7969  
Utah Attorney General  
Attorneys for the Plaintiff  
210 N 1950 W  
SALT LAKE CITY, UT 84134-9000  
Telephone: 801-297-6219 801-366-0375

---

In the United States Bankruptcy Court

For the District of UTAH

---

In Re:

MORTENSEN, JEFF H  
XXX-XX-5790

Debtor

Bankruptcy Case Number:  
21-23563

Chapter: 13

OBJECTION TO CONFIRMATION OF  
CHAPTER 13 PLAN

---

COMES NOW, the Utah State Tax Commission and objects to confirmation of debtor's Chapter 13 plan as authorized by 11 U.S.C. Sec.1324. This objection is made on the grounds that the plan does not comply with the provisions of Chapter 13 and has not been proposed in good faith as required by 11 U.S.C. Sec.1325 (a) (1), (3), and in failure of debtor(s) to comply with 11 U.S.C. Sec. 1322 (a) (2) to provide for the full payment of all Utah State Tax Commission tax claims entitled to priority under 11 U.S.C. Sec. 507.

Debtor's plan specifically fails to provide for full payment of the following debt: The debtor(s) has(have) failed to file appropriate Tax Returns for 2018, 2019 as requested by the Utah State Tax Commission as set forth in the interim Order.

DATED this 23rd day of August, 2021

/s/ Bryant T. Hinckley  
Assistant Attorney General